

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ITV DIRECT, INC.,)	
)	
Plaintiff,)	Civil Action No. 04-CV-10421-JLT
)	
v.)	
)	
HEALTHY SOLUTIONS, L.L.C., et al.,)	
)	
Defendants.)	
)	
CAPPSEALS, INC.,)	
)	
Plaintiff-in-Intervention,)	
)	
v.)	
)	
HEALTHY SOLUTIONS, L.L.C., d/b/a)	
DIRECT BUSINESS CONCEPTS; ITV)	
DIRECT, INC., and DIRECT)	
FULFILLMENT, LLC,)	
)	
Intervenor-Defendants.)	

RELATED CASE:

HEALTHY SOLUTIONS, LLC et al.	Civil Action No 04-10829-JLT
Plaintiffs,	
v.	
ITV DIRECT, Inc., et al.,	
Defendants.	

**JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER
GOVERNING THE PRODUCTION AND EXCHANGE
OF CONFIDENTIAL INFORMATION**

Pursuant to Fed. R. Civ. P. 26(c), the parties to the above-captioned actions, plaintiff ITV Direct, Inc. and intervenor-defendant Direct Fulfillment, LLC (collectively, "ITV"), and defendants Healthy Solutions, LLC, Health Solutions, Inc., Alejandro Guerrero, Michael Howell,

and Greg Geremesz (collectively, the “Healthy Solutions Defendants”), and plaintiff-in-intervention Cappseals, Inc. (“Cappseals”) (collectively, the “Parties”), hereby move the Court to enter the Stipulated Protective Order Governing the Production and Exchange of Confidential Information, which has been executed by the Parties and is attached hereto as Exhibit 1. The Parties believe that documents and other discovery containing confidential or proprietary business or financial information may be sought and produced in this action, and therefore, have agreed that the procedures outlined in Exhibit 1 will control the treatment of such information.

WHEREFORE the Parties to this action respectfully request that the Court enter the Stipulated Protective Order Governing the Production and Exchange of Confidential Information.

Respectfully submitted,

ITV DIRECT, INC. and DIRECT
FULFILLMENT, LLC

HEALTHY SOLUTIONS, LLC, HEALTH
SOLUTIONS, INC., ALEJANDRO
GUERRERO, MICHAEL HOWELL, and GREG
GEREMESZ,

By their attorney(s),

By their attorneys

/s/ Peter S. Brooks
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CAPPSEALS, INC.,

By their attorney(s),

/s/ Daniel J. Kelly

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SO ORDERED: _____
United States District Judge Joseph L. Tauro

Dated: August 10, 2004

